

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CODA DEVELOPMENT s.r.o., CODA INNOVATIONS s.r.o., and FRANTISEK HRABAL,)	
)	
)	Case No. 5:15-CV-01572-SL
)	
Plaintiffs)	JUDGE SARA LIOI
)	
v.)	<u>JOINT STATUS REPORT</u>
)	
THE GOODYEAR TIRE & RUBBER COMPANY and ROBERT BENEDICT,)	
)	
)	
Defendants.)	
)	

NOW COME Plaintiffs Coda Development s.r.o., Coda Innovations s.r.o., and Frantisek Hrabal (collectively, hereinafter “Coda”), and Defendants The Goodyear Tire & Rubber Company and Robert Benedict (“Goodyear” and, together with Coda, the “Parties”), by and through their respective undersigned counsel, and pursuant to this Court’s Fifth Amended Case Management Plan and Trial Order (Dkt. 184) hereby submit this Joint Status Report.

I. DISCOVERY

Fact discovery began on August 1, 2019, and closed on July 21, 2020. Expert discovery began on September 10, 2020, and closed on December 22, 2020.

II. SETTLEMENT DISCUSSIONS

The parties engaged in mediated discussions in September 2022. The parties have agreed to further settlement discussions, but those discussions have not yet occurred.

III. MOTIONS THAT HAVE BEEN FILED OR REMAIN PENDING

On October 14, 2022, the parties filed post-trial briefs on equitable claims (Dkt. 378) and

defenses (Dkt. 377), and Goodyear filed a Rule 50(b) motion for judgment as a matter of law (Dkt. 376). Briefing is ongoing.

IV. DEVELOPMENTS THAT MIGHT GIVE RISE TO A REQUEST TO DEVIATE FROM THE SCHEDULE

The Court issued a post-trial briefing schedule on October 13, 2022. (Dkt. 375.) At present, the Parties have not raised any issue that might require a further request to deviate from the schedule.

Respectfully submitted,

/s/John C. Evans (with email permission)

Calvin P. Griffith (0039484)
cpgriffith@jonesday.com
David M. Maiorana (0071440)
dmaiorana@jonesday.com
John C. Evans (0081878)
jcevans@jonesday.com
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114

Attorneys for Defendants

Respectfully submitted,

/s/ ScottM. Richey

Stephen W. Funk (0058506)
funk@ralaw.com
Emily K. Anglewicz (0083129)
eanglewicz@ralaw.com
Roetzel & Andress, LPA
222 South Main Street
Akron, OH 44308
(T) 330.376.2700
(F) 330.376.4577

Boyd Cloern (*Pro Hac Vice*)
bcloern@steptoe.com
Leah Quadrino (*Pro Hac Vice*)
lquadrino@steptoe.com
Scott M. Richey (*Pro Hac Vice*)
srichey@steptoe.com
Joseph Ecker
jecker@steptoe.com
Steptoe & Johnson LLP
1330 Connecticut Ave., NW
Washington, DC 20036
Telephone: (202) 429-3000
Facsimile: (202) 429-3902

Attorneys for Plaintiffs

PROOF OF SERVICE

The foregoing was filed electronically with the Court on October 27, 2022. Notice of this filing was sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Scott M. Richey